

RUSSELL L. LOW, ESQ. RLL-4745
LOW & LOW, LLC
505 Main St., Suite 304
Hackensack, NJ 07601
201-343-4040 Phone
201-880-4010 Fax
Attorney for Debtors

In the Matter of:

: UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY

Carlos O. Moyeno

: Honorable Vincent F. Papalia

: CASE NO. 15-17588

Debtor

: CHAPTER 13

**OBJECTION TO APPLICATION FOR EARLY TERMINATION OF LOSS
MITIGATION PERIOD**

I, Russell L. Low, being of full age, hereby certify the following:

1. I represent the above-mentioned debtor, Carlos O. Moyeno in this current bankruptcy proceeding.
2. An order was entered on August 23, 2018 to participate in the Court's Loss Mitigation Program.
3. The debtor was denied an extension of Loss Mitigation on December 12, 2019.
4. The debtor failed to provide the documents requested by the deadline which was October 18, 2019.
5. However, the Debtor is respectfully requesting more time to comply with the lender's recent request for additional documents.

Dated: December 17, 2019

/s/ Russell L. Low, Esq.
RUSSELL L. LOW, ESQ.
Attorney for Debtor